

Guido Saveri (22349)

guido@saveri.com

R. Alexander Saveri (173102)

rick@saveri.com

Geoffrey C. Rushing (126910)

grushing@saveri.com

Travis L. Manfredi (281779)

travis@saveri.com

SAVERI & SAVERI, INC.

706 Sansome Street

San Francisco, California 94111

Telephone: (415) 217-6810

Facsimile: (415) 217-6813

*Interim Lead Counsel for the
Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV- 07-5944-SC

MDL No. 1917

This Document Relates to:

DIRECT PURCHASER CLASS ACTIONS

**DECLARATION OF TRAVIS L. MANFREDI
IN SUPPORT OF DIRECT PURCHASER
PLAINTIFFS' ADMINISTRATIVE MOTION
TO SEAL DOCUMENTS PURSUANT TO
CIVIL LOCAL RULES 7-11 AND 79-5(d)**

1 I, TRAVIS L. MANFREDI, declare as follows:

2 1. I am a member in good standing of the State Bar of California and an associate
3 attorney at the law firm, Saveri & Saveri, Inc., Interim Lead Counsel for the Direct Purchaser
4 Plaintiffs. I make this declaration, except where noted, of my own personal knowledge, and, if
5 called upon to do so, I could and would testify competently to the facts contained herein.

6 2. I submit this Declaration in support of Plaintiffs' motion to file the following
7 documents under seal pursuant to Civil Local Rules 7-11 and 79-5(d):

- 8 • Gray highlighted Portions of the Reply Brief in Support of Direct Purchaser Plaintiffs'
9 Motion for Class Certification that contain quotations or information from documents
10 that Defendants have designated "Confidential" or "Highly Confidential";
- 11 • Exhibits 1, 5, 6, and 7 to the Declaration of Geoffrey C. Rushing in Support Reply Brief
12 in Support of Direct Purchaser Plaintiffs' Motion for Class Certification that contain
13 quotations or information from documents that Defendants have designated
14 "Confidential" or "Highly Confidential"; and
- 15 • The Reply Expert Report of Jeffrey J. Leitzinger, Ph.D.

16 3. On June 18, 2008, the Court approved a "Stipulated Protective Order" ("Protective
17 Order") in this matter.

18 4. Section 10 of the Protective Order requires that "a Party may not file in the public
19 record in this action any Protected Material. A Party that seeks to file under seal any Protected
20 Material must comply with Civil Local Rule 79-5."

21 5. Plaintiffs seek to file the documents (or portions thereof) listed above in Paragraph 2
22 under seal pursuant to certain orders regarding the sealing of documents issued by this Court.

23 6. The documents (or portions thereof) listed in Paragraph 2 contain similar
24 information to the documents that were ordered filed under seal by this Court in connection with
25 Direct Purchaser Plaintiffs Motion for Class Certification that was filed on May 14, 2013. *See*
26 Order Granting Direct Purchaser Plaintiffs' Administrative Motion to Seal Documents Pursuant to
27 Civil Local Rules 7-11 and 79-5(d) (May 29, 2013) (Dkt. No. 1698).

28 7. The documents (or portions thereof) that are identified in Paragraph 2 have been
designated as confidential by the SDI Defendants, the Hitachi Defendants, Defendant Chunghwa

1 Picture Tubes, Ltd., the Panasonic Defendants, the Philips Defendants, and the Toshiba
2 Defendants.

3 8. A stipulation by the parties could not be obtained because under Civil Local Rule
4 79-5, parties may not stipulate to the filing of any document under seal. See Civil L.R. 7-11(a), 79-
5 5(a).

6
7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed this 11th day of November, 2013 in San Francisco,
9 California.

10
11 /s/ Travis L. Manfredi

12 Travis L. Manfredi
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28